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Attorneys for Plaintiff
ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

ELECTRIC SOLIDUS, INC.
d/b/a SWAN BITCOIN,
a Delaware corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD.,
a British Virgin Islands corporation;
THOMAS PATRICK FURLONG;
ILIOS CORP., a California corporation;
MICHAEL ALEXANDER HOLMES;
RAFAEL DIAS MONTELEONE;
SANTHIRAN NAIDOO;
ENRIQUE ROMUALDÉZ; and
LUCAS VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**NOTICE OF MOTION AND
MOTION TO COMPEL
DEFENDANTS TO COMPLY
WITH TARGETED DISCOVERY**

DISCOVERY MATTER

Hearing Date: May 16, 2025
Time: 9:30 a.m.
Place: Courtroom 750, 7th Fl.
Judge: Hon. Charles F. Eick

Discovery Cutoff: November 7, 2025
Pre-Trial Conf. Date: April 26, 2026
Trial Date: May 4, 2026

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on May 16, 2025 at 9:30 a.m. or as soon
3 thereafter as may be heard in Courtroom 750, 7th Floor of the above-entitled court,
4 located at Roybal Federal Building and United States Courthouse, 255 East Temple
5 Street, Los Angeles, CA, 90012, Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin
6 (“Swan”) will and hereby moves this Court for an order compelling Defendants to
7 respond fully to Swan’s Targeted Discovery Requests, and overruling Defendants’
8 objections to those Requests..

9 This Motion is made pursuant to Rules 26 and 37 of the Federal Rules of
10 Civil Procedure and Local Rule 37-1.

11 This Motion is based on this Notice of Motion, the concurrently filed Joint
12 Stipulation, all of the pleadings, files, and records in this proceeding, all other
13 matters of which the Court may take judicial notice, and any argument or evidence
14 that may be presented to or considered by the Court prior to its ruling.

15 Pursuant to Local Rule 37-1, the parties met and conferred regarding this
16 Motion by written correspondence exchanged beginning on March 28, 2025 and by
17 teleconferences conducted on March 26, April 1, and April 3, 2025, but the parties
18 were not able to consensually resolve these discovery disputes.

1 DATED: April 23, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

3 By /s/ Ryan S. Landes

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